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13

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION
17

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 SHENG THAO, ANDRE JONES, DAVID
TRUNG DUONG, and ANDY HUNG
22 DUONG,

23 Defendants.
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Case No. 4:25-CR-00003-YGR

**[PROPOSED] ORDER GRANTING
DEFENDANT DAVID DUONG'S
MOTION TO MODIFY FILTER TEAM
PROTOCOL**

Hearing Date: April 24, 2025

Hearing Time: 10:30 a.m.

Judge: Hon. Yvonne Gonzalez Rogers

Courtroom: 1, 4th Floor

**[PROPOSED] ORDER GRANTING MOTION TO MODIFY FILTER TEAM
PROTOCOL**

Mr. David Duong filed a Motion to Modify Filter Team Protocol. The Court, having considered the pleadings and any argument by counsel, hereby **GRANTS** the Motion and orders that the government do the following:

1. The government's filter team shall identify to defense counsel all documents that the filter team has previously promoted or intends to promote to the prosecution team in the future so that defense counsel can review the material for any appropriate objections. Defense counsel shall have two weeks from receipt of notice from the filter team to raise any objections. The filter team shall not promote any of the identified materials during the two week period that defense counsel can review for objections.
2. The filter team shall return all copies of a defendant's privileged material in the government's possession to counsel for that defendant. The filter team shall not maintain any copy of any material it concludes is privileged.
3. The filter team shall provide defense counsel a copy of the government's filter team protocol. The government may redact any work product from the memorandum containing the filter team protocol before providing the filter team protocol to defense counsel.

IT IS SO ORDERED.

DATED: _____

By: _____
YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Trudy Carney, declare:

I am a citizen of the United States and employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Silicon Valley Office, 1755 Embarcadero Road, Palo Alto, California 94303. On March 19, 2025, I served a copy of the [Proposed] Order Granting Defendant David Duong's Motion to Modify Filter Team Protocol by electronic transmission.

I am familiar with the USDC Northern District's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the Court. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the Court's transmission facilities.

Executed on March 19, 2025, Palo Alto, California.


Trudy Carney

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